



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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APR 12 2010

Environmental
Cleanup Office

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4.8.1
4-8-10

April 8, 2010

Ron Altier
Vice President
Jorgensen Forge
8531 East Marginal Way
Seattle, WA 98108-4018

Dear Mr. Altier:

RE: DRAFT SOURCE CONTROL ADDENDUM REPORT dated December 2009

Thank you for sending the *Draft Source Control Evaluation Addendum Report*. The Department of Ecology (Ecology) has reviewed this report and has the following comments:

Groundwater

The report documents that zinc was found in groundwater samples from well MW-45. Nickel was found in MW-44 and SB-13 and SB-14. As the report points out the results are sporadic. They are also fairly low, however more analysis and/or modeling is needed before concluding there is no potential threat to sediments. As the report also points out, these metals are naturally occurring in some Washington soils. That would not usually translate into filtered groundwater results as high as found. Metals don't necessarily come out of soils into groundwater unless they are at high levels or there's a pH problem. Re-sampling the available wells and including laboratory filtering before analysis is necessary in order to understand what the zinc and nickel results mean. Typically a groundwater monitoring program is for four quarters, and Ecology is requesting that.

Stormwater

The report documents that cadmium, copper and nickel in concentrations above screening levels were found in roof drains. Please endeavor to discover why they are present: Do they represent air deposition? As mentioned in the report, further mitigation measures are necessary to prevent discharge of metals from outfalls 001, 002, and 003 to the Lower Duwamish Waterway. Please let Ecology know how you intend to stop these discharges.

In a related matter, I am attaching a Stormwater Compliance Inspection Report in which Ecology's Water Quality Program raises concerns about slag storage in the south west corner of the facility. Please see photos 17 and 18 of the attached report that were taken

USEPA SF



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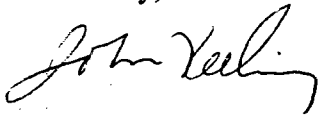


by Ecology on January 13, 2010. Please provide a short explanation of why this area is not a problem (per the Source Control Evaluation Report), and why no metals or other contaminants are getting to the Duwamish.

Please respond within 45 days of the receipt of this letter as provided for by the Agreed Order, or submit a written request for an extension within 45 days of the receipt of this letter.

If you have any questions, please call me at (425) 649-7052.

Sincerely,

A handwritten signature in black ink, appearing to read "John Keeling", with a stylized, flowing script.

John Keeling

Enclosure

Cc Shawn Blocker
 Michael Sibley
 Ryan Barth
 Rick Thomas
 Robert Wright

EPA
EPA
Anchor QEA, LLC
Ecology
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